REMARKS

This reply is responsive to the office action dated April 15, 2009. Upon entry of this amendment claims 1 and 3-6 are pending. Independent claims 1 and 4 have been amended, claim 2 is cancelled and new claim 6 is added. Reconsideration of the pending claims in light of the remarks and amendments is respectfully requested.

In the April 15, 2009 office action, the examiner:

(1) objected to the Abstract;

(2) rejected claim 1 under 35 U.S.C. § 112, first paragraph;

(3) rejected claims 1 and 4 under 35 U.S.C. §101; and

(4) rejected claims 1-5 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Application Publication No. 2002/0068632 to Dunlap. Claims 1 and 4 are independent claims.

I.   Examiner Interview

Applicants would like to thank examiner Ahmed for taking time to discuss applicant's positions in the telephone interview on August 5, 2009. In the interview, applicant's representative explained the distinguishing features of claims 1 and 4 to the examiner.

With regard to independent claim 1, applicant's representative noted that the cited art does not disclose a system in which, in combination with the inputting of a password, a first portion of the image of a present item is stored in the game terminal, a second portion of the image is stored on the server, and the complete image is formed by combining the first and second portions, where the complete image of the item cannot be formed without combining the first and second portions.

With regard to independent claim 4, applicant's representative noted that the cited art does not disclose a system in which predetermined items are stored as control

items in a control item table located on the game terminal, the control items are also stored in a master control item table located on the server, and the contents of the master control item table are loaded into the control item table located on the game terminal at predetermined time intervals to renew the control item table on the game terminal to thereby prevent user tampering.

II.   Objection to the Abstract

The examiner objected to the abstract as containing reference numbers and acronyms. A replacement Abstract is attached, eliminating the aforementioned reference numbers and acronyms.

III.   Rejections Under 35 U.S.C. § 112, First Paragraph

Claim 1 stands rejected under 35 U.S.C. § 112, first paragraph as filing to comply with the written description requirement. Specifically, the examiner noted that the following limitations were not supported by the specification:

> "providing a first portion of data in said game playing terminal at a first time, said first portion of data comprising image data corresponding to said present item;
>
> providing a second portion of data downloaded into said game playing terminal from said server at a second time different from said first time, said second portion of data comprising image data corresponding to said present item, said first portion of data being a part of said image of said present item, said second portion of data being a remaining part of said image of said present item; and producing a complete image of said present item by said game playing terminal by synthesizing the first and second portions of data."

Applicants have amended claim 1 to eliminate these limitations. Claim 1 now recites, *inter alia,*

> "storing data in said memory of each of said plurality of game playing terminals, said data including a first portion of data

representing a first portion of a complete image of a present item . . .

storing a second portion of data in memory means of said server, said second portion of data representing a second portion of the complete image of said present item . . .

downloading said second portion of data from said server into said game playing terminal through said communication line;

reading said first portion of data from said memory means of said game playing terminal, producing said complete image of said present item from said first and second portions of data, and displaying said complete image of said present item on said display;

wherein it is impossible to produce said complete image of said present item from only said first portion of data or said second portion of data . . . ."

Thus, as presently recited, a "complete image" of a present item (*e.g.,* the complete card image shown in Fig. 4(c)) is constructed from a first portion of data (representing a first portion of the "complete image" of the present item) and a second portion of data (representing a second portion of the "complete image" of the present item). The first portion of data is stored in the game playing terminal, and the second portion of data is stored in the server. Neither portion of data, taken alone, can be used to construct the complete card image shown in FIG. 4(c). Only when the two portions of data are combined can the complete card image be constructed and displayed.

Support for this amendment is found at paragraphs [0066] - [0070] and [0072] of the instant specification.

Based on the above, applicants request that the 35 U.S.C. § 112 rejection of claim 1 be withdrawn.

IV. Rejections Under 35 U.S.C. § 101

Claims 1 and 4 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter.

Claim 1 has been amended to recite, *inter alia,*

> "storing [a] card game in memory on each of [a] plurality of game playing terminals . . .
> storing data in said memory of each of said plurality of game playing terminals, said data including a first portion of data representing a first portion of a complete image of a present item;
> selecting said two or more playing cards to be used in said game from playing cards stored in said memory of said game playing terminal . . .
> storing a second portion of data in memory means of [a] server . . .
> setting said point which shows game playable volume corresponding to said password on an account which is set in said memory means of said server, by said server;
> selecting said present item to be downloaded to said game playing terminal from a plurality of present items stored in said memory means of said server . . .
> reading said first portion of data from said memory means of said game playing terminal, producing said complete image of said present item from said first and second portions of data, and displaying said complete image of said present item on said display . . . ."

Claim 4 has been amended to recite, *inter alia,*

> "controlling a game with a communication line, for storing a game program . . . in memory means of [a] server for each player by said server, and for controlling [a] game playing terminal by said server through said communication line . . . comprising:
> controlling said game playing terminal to store predetermined items . . . as control items in a control item table . . . in said memory means of said game playing terminal;
> reading said control item to be displayed out of said control item table . . .
> storing said control items . . . in a master control item table which is stored in said memory means of said server by an account control portion of said server; and

> loading . . . said contents of said master control item table .
> . . into said game playing terminal . . . to renew said control item
> table for display in said game playing terminal by said game
> execution control portion of said game playing terminal . . . ."

Applicants believe that claims 1 and 4 are now sufficiently tied to an apparatus to satisfy the requirements of 35 U.S.C. § 101, and thus respectfully request that these rejections be withdrawn.

V.   Rejections Under 35 U.S.C. § 103(a)

A.   Claims 1 and 3

Claims 1 and 3 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlop. Claim 1 is an independent claim, while claim 3 depends therefrom.

Applicants believe that claim 1 is patentable over Dunlap because that reference fails to disclose, teach or suggest all of the limitations of claim 1. Specifically, Dunlap fails to disclose, teach or suggest:

> "storing data in . . . memory of each of [a] plurality of game
> playing terminals, said data including a first portion of data
> representing a first portion of a complete image of a present item;
> storing a second portion of data in memory means of [a] server,
> said second portion of data representing a second portion of the
> complete image of said present item;
> distributing a plurality of game cards for said predetermined
> game, to which proper passwords are respectively assigned;
> transmitting said proper password of said distributed game card
> from a game playing terminal to a server through said
> communication line by inputting said password through an input
> portion of said game playing terminal . . .
> reading said first portion of data from said memory means of
> said game playing terminal, producing said complete image of
> said present item from said first and second portions of data, and
> displaying said complete image of said present item on said
> display;
> wherein it is impossible to produce said complete image of said
> present item from only said first portion of data or said second
> portion of data . . . ," as recited by claim 1.

In the Office Action mailed April 15, 2009, the examiner states:

"Dunlap clearly discloses the feature of storing the
characteristic data physically in the playing card or . . . in the
server . . . further for . . . enhanced security and authentication a
suwer log on or password is required for the system (para 0065)."
(*See* Office Action, 4/15/09, pg. 7, lines 8-12.)

The examiner further states :

"it would have been obvious to the ordinary skilled artisan
at the time of invention to use Dunlap's game system to modify
downloading game character image and the game character data
at a separate time interval as an alternative security measure to
the Dunlap's teachings of authentication." (*See id.,* 4/15/09, pg. 7,
lines 17-20.)

In response, applicants note that claim 1 recites that the two-part image data
feature is provided <u>in addition to a password</u>, not as an alternative to password
protection. Thus, Dunlap fails to disclose, teach or suggest the claimed features of
providing, in addition to a password, two complementary portions of image data, and
combining those portions into a complete image of a game item, where neither of the
two complementary portions of image data alone can produce the complete image of
the game item.

With the claimed invention, the image of a game item ("present item") is
produced using two components of image data – the first component resides in the
terminal, and the second component is downloaded from the server to the terminal.
Thus, it is not possible to produce the image of the "present item" from only the first
portion of image data or only the second portion of image data. This enhances the
security of the system by preventing a player from tampering with card data to obtain a
higher-value card (*e.g.,* altering the card data to obtain an undeserved "rare" card). The
claimed invention provides this feature without the need for additional hardware
mounted on the game playing terminal.

Because Dunlap fails to disclose, teach or suggest this feature, applicants request that the 35 U.S.C. § 103(a) rejection of independent claim 1 be withdrawn. With respect to claim 3, which depends from independent claim 1 and recites additional features of the invention, applicants request that the 35 U.S.C. § 103(a) rejection of this claim be withdrawn for the same reasons as stated for claim 1.

B.   Claims 4 and 5

Claims 4 and 5 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlop. Claim 4 is an independent claim, while claim 5 depends therefrom.

Applicants believe that claim 4 is patentable over Dunlap because that reference fails to disclose, teach or suggest all of the limitations of the claim. Specifically, Dunlap fails to disclose, teach or suggest:

> "controlling a game with a communication line, for storing a game program . . . in memory means of [a] server for each player by said server, and for controlling [a] game playing terminal by said server through said communication line . . . comprising:
> controlling said game playing terminal to store predetermined items . . . as control items in a control item table . . . in said memory means of said game playing terminal;
> reading said control item to be displayed out of said control item table . . .
> storing said control items . . . in a master control item table which is stored in said memory means of said server by an account control portion of said server; and
> loading . . . said contents of said master control item table . . . into said game playing terminal . . . to renew said control item table for display in said game playing terminal by said game execution control portion of said game playing terminal . . . ," as recited by claim 4.

With the claimed invention, a player is prevented from unfairly hacking the system to obtain control items such as "rare" cards used in the game. This is because all control items used by a player are renewed/controlled on the *server* side for each player, and a *copy* of the control item table is downloaded to each game terminal. The

control item table for each terminal is renewed (using the contents of the master control table located on the server) at periodic time intervals. Thus, even if a player unfairly attempts to obtain a desirable control item (*e.g.,* a "rare" card) by hacking/rewriting data in the control item table on the game playing terminal, the improperly rewritten data is over-written ("renewed") by the correct data downloaded by the server at the next predetermined time interval. In this way, the system deters cheating and hacking.

Dunlap fails to disclose, teach or suggest this feature, and thus, applicants request that the 35 U.S.C. § 103(a) rejection of independent claim 4 be withdrawn. With respect to claim 5, which depends from independent claim 4 and recites additional features of the invention, applicants request that the 35 U.S.C. § 103(a) rejection of this claim be withdrawn for the same reasons as stated for claim 4.

The claims are believed to be in condition for allowance, and reconsideration and allowance are respectfully requested.

This response is being filed along with a petition for a two-month extension of time. The Commissioner is hereby authorized to charge the fee associated with this petition, as well as any other required fees, to deposit account number **04-1679.**

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Respectfully submitted,
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